

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Pioneer Navigation Ltd.,

Petitioner

- against -

Chemical Equipment Labs, Inc.,

Respondent

19 Civ. 02938 (DAB)

ECF case

**NOTICE OF MOTION TO
VACATE ARBITRATION AWARD**

PLEASE TAKE NOTICE that upon the attached Memorandum of Law and the accompanying declaration of Keith W. Heard and the exhibits annexed thereto, respondent Chemical Equipment Labs, Inc. will move this court before the Honorable Deborah A. Batts, United States District Judge, pursuant to the Federal Arbitration Act, 9 U.S.C. § 10, and the doctrine of manifest disregard for an order vacating the Final Award dated January 31, 2019 in the arbitration between the parties (Exhibit 2 to the Petition), with oral argument on the motion, if any, to be scheduled at a date and time convenient to the Court.

Dated: New York, New York
April 30, 2019

LENNON, MURPHY & PHILLIPS LLC
Attorneys for Respondent
Chemical Equipment Labs, Inc.

s/ Keith W. Heard

The GrayBar Building
420 Lexington Avenue, Suite 300
New York, New York 10170
kwh@lmplaw.net
(212) 490-6050 – telephone
(212) 490-6070 – facsimile